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Attorneys for Plaintiff AURORA GARCIA-BORJON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

AURORA GARCIA-BORJON,

Case No. 1:24-cv-01537-KES-BAM

Plaintiff,

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND TIME TO DISMISS ACTION**

vs.

EVERBRIGHT, LLC,

Defendant.

Pursuant to Local Rule 144, Plaintiff Aurora Garcia-Borjon (“Plaintiff”) and Defendant EverBright, LLC (“Defendant” together with Plaintiff, the “Parties”), by and through their respective undersigned counsel of record, hereby stipulate and seek an Order extending time to dismiss this action as follows:

WHEREAS, on June 12, 2025, the Court issued a Minute Order signed by Magistrate Judge Barbara A. McAuliffe (ECF No. 27) which, among other things, scheduled a deadline of July 2, 2025 for the parties to file appropriate papers to dismiss or conclude this action in its entirety;

WHEREAS, the Parties executed a Settlement Agreement and Release on June 18,

2025;

WHEREAS, the terms of settlement require a payment by Defendant to Plaintiff within thirty (30) business days of the execution of the Settlement Agreement and Release, that deadline being August 1, 2025;

WHEREAS, the terms of settlement further require Plaintiff to dismiss the action within seven (7) days after receipt of Defendant's payment, that deadline being August 8, 2025;

WHEREAS, this is the first extension that the Parties have requested;

WHEREAS, the Parties agree and stipulate and request this Court to extend the deadline to August 8, 2025 for the parties to file appropriate papers to dismiss or conclude this action in its entirety;

WHEREAS, the requested extension is sought in good faith and not for the purposes of delay or any other improper reason.

IT IS SO STIPULATED.

Dated: June 30, 2025

KEMNITZER, BARRON & KRIEG, LLP

By: /s/ Kristin Kemnitzer
KRISTIN KEMNITZER
Attorneys for Plaintiff Aurora Garcia-Borjon

Dated: June 30, 2025

BALLARD SPAHR LLP

By: /s/ Melanie J. Vartebedian
MELANIE J. VARTEBEDIAN
Attorneys for Plaintiff EverBright, LLC

ORDER

Pursuant to the foregoing Stipulation, and good cause appearing, IT IS SO ORDERED that the Parties shall file appropriate papers to dismiss or conclude this action in its entirety not later than August 8, 2025.

IT IS SO ORDERED.

Dated: July 1, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE